REMARKS/ARGUMENTS

Reconsideration of this application is respectfully requested.

I. Status of the Application

Claims 1- 7, 9 - 13 and 15 remain in this application. Claims 8 and 14 have been previously canceled. With this Response, Applicants cancel dependent claim 6 without prejudice or disclaimer, and amend independent claims 1 and 10 and dependent claims 7, 9 and 13. No new matter is introduced. Support for the amendments may be found, for example, at page 7, line 8 through page 9, line 9 of Applicants' specification.

II. Claim Rejections

Claims 1 - 7, 9 - 13 and 15 are rejected under 35 USC §103(a) as being unpatentable over Tarnanen (U.S. Patent No. 6,085,100) in view of Ala-Laurila (U.S. Patent No. 6,546,871). Applicants cancel dependent claim 6 without prejudice or disclaimer, amend independent claims 1 and 10 inter alia to essentially include the limitations of canceled claim 6, amend dependent claims 7 and 9 to depend from amended independent claim 1, amend dependent claim 13 to conform to amended independent claim 10, and respectfully traverse this rejection.

In amended independent claim 1, Applicants disclose:

> **1.** A method for tracking messages delivered via a short message service (SMS) comprising the steps of:
>
> receiving, at a gateway, a message destined for a mobile device;
>
> assigning a unique identifier to the received message;
>
> recording the received message and the unique identifier to a record in a database accessible to the gateway;
>
> forwarding the received message from the gateway to the mobile device, wherein the forwarded message sent from the gateway to the

mobile device includes an origination address, the origination address being derived from the unique identifier;

receiving, at the gateway, a reply to the message from the mobile device;

correlating the reply to the sent message by means of the unique identifier;

recording the correlated reply in the database record storing the sent message; and

allowing either of a sender or a recipient of the message to log in to the gateway to retrieve the database record to access and view each of the received message and the reply.

Tarnanen discloses a system and method for routing a reply to a short message using an identifier assigned to the message upon receipt from a sender at a gateway application. The procedure for dealing with received messages at the gateway application is set forth in FIG. 5 of Tarnanen (see also Col. 7, lines 15-41). When a data message intended for a recipient is received (step 10), an identifier is created and assigned using the recipient's address and a time stamp (step 20). A temporary record is stored in a database of the gateway application, which includes the sender's address, the recipient's address and the identifier (step 30). The short message is then transmitted by the gateway application for delivery to the recipient. The procedure for routing replies to the received message at the gateway application is set forth in FIG. 6 of Tarnanen (see also Col. 7, lines 42-55). The reply sent from the recipient of the short message is received (step 50), the identifier is examined (step 60), the source address of the sender is retrieved from the temporary record in the database using the identifier (step 70), and the reply is transmitted to the sender's source address (step 80). Significantly, the only information stored in the temporary record in the database are the network address of the sender of the short message, the address of the intended recipient and the assigned identifier (Tarnanen, Col. 3, lines 1-10; Col. 6, lines 20-37). At no time are either of the received message or the reply stored in the database for later viewing.

With reference to independent claims 1 and 10, the Examiner acknowledges that Tarnanen fails to disclose Applicants' claimed step of allowing a sender or a recipient of the message to view the message recorded in the database. The Examiner however asserts that this step is disclosed or suggested by Ala-Laurila.

Ala-Laurila discloses a message-accessing apparatus enabling selected (voice) messages to be accessed by multiple recipients using a cellular network (see, e.g., abstract of Ala-Laurila). The accessing apparatus assigns a temporary access code to a selected message, and then transmits the access code to the intended recipients in the cellular network. The recipients are then able to access the message-accessing device, and to use the temporary access code to access the selected message.

Applicants amend independent claim 1 to essentially include the limitations of canceled claim 6. In the present Office Action, the Examiner suggests that the additional limitations of canceled claim 6 are taught by Tarnanen. Applicants respectfully disagree.

In the routing system of Tarnanen, routing data of a short message including the original source address of the message and a unique identifier are stored in the database (see, e.g., column 2, line 55 - column 3, line 14 of Tarnanen). In response to the receipt of a reply from a recipient that includes the unique identifier, the routing system uses the unique identifier to index and retrieve the original source address from the database, for forwarding the reply to the sender via the original source address.

With the addition of Ala-Laurila, Applicants submit that the combined references may be viewed to suggest only that each of the original source address and the received message may both be retrieved according to the unique identifier. In other words, and in sharp contrast to Applicants' claimed invention, neither reference, either alone or in combination, teaches or suggests, in addition, that a reply to the received message be correlated to the received message by the unique identifier, and then stored in the database.

As previously acknowledged, Tarnanen teaches storage of user addresses correlated with an identifier, but not storage of messages correlated with an identifier. Ala-Laurila teaches storing an individual message correlated with a temporary identifier, but does not teach or fairly suggest correlating both a received message and a reply with the same temporary identifier. In fact, Ala-Laurila teaches away from storing the reply together with a received message, as the apparatus of Ala-Laurila is intended to provide message access by multiple recipients, each capable of generating a distinct reply, again potentially directed to multiple recipients.

Accordingly, the combination of Tarnanen and Ala-Laurila is most reasonably interpreted to suggest an approach in which a first identifier may be used to construct destination addresses for multiple recipients, each of whom may use the identifier to access the received message and to determine the sender's address to facilitate a reply. The combination would then suggest that a second identifier be transmitted to the sender's address with the reply to facilitate the sender's access to the reply.

Thus, Applicants respectfully submit that while the combination of Tarnanen and Ala-Laurila fails to teach or suggest Applicants' claimed method in which a unique identifier may be used to record each of a received message and a reply to a database, based on a unique identifier that correlates the reply with the received message. Moreover, and as further claimed in amended independent claim 1, the combination of Tarnanen and Ala-Laurila fail to teach or suggest that the received message and reply are both recorded in an individual data record of the database.

For at least these reasons, Applicants respectfully submit amended independent claim 1 is not made obvious by the combination of Tarnanen and Ala-Laurila, and stands in condition for allowance. Applicants reapply the above arguments in view of amended independent claim 10, which essentially includes the same limitations that were argued in reference to claim 1. Accordingly, for at least the same reasons, Applicants submit that amended independent claim 10 is not made obvious by the cited references and stands in condition for allowance. As each of dependent claims 2 - 5, 7, 9, 11 - 13 and 15 depend from one of allowable claims 1 and 10,

Applicants further submit that dependent claims 2 - 5, 7, 9, 11 - 13 and 15 are also allowable for at least this reason.

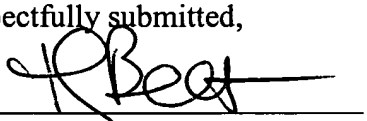
CONCLUSION

Therefore, in view of the above amendments and remarks, it is respectfully requested that a Notice of Allowance as to all pending claims be issued in this case.

If there are any other issues remaining which the Examiner believes could be resolved through either a Supplemental Response or an Examiner's Amendment, the Examiner is respectfully requested to contact the undersigned at the telephone number indicated below.

Dated: June 21, 2006

Respectfully submitted,

By 

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